SEP 2 2 2003

510(K) SUMMARY (as required by 807.92(c))

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Submitter of 510(k):

Cyber Orthology, Inc.

6301 Hughes Dr.

Sterling Heights, MI 48312

Phone: 586-264-9544 Fax: 586-264-9566

**Contact Person:** 

Dr. Djoldas Kuldjanov

Date of Summary:

June 30, 2003

Trade Name:

CyberOrthology Carbon Fiber Composite Circular Fixation

(CIRfix) Device (Half Ring)

**Classification Name:** 

APPLIANCE, FIXATION, NAIL/BLADE/PLATE

COMBINATION, MULTIPLE COMPONENT

**Classification Product Code:** 

**KTT** 

**Predicate Device:** 

Ilizarov External Fixation System

K962808

External Fixation System

K870961

Intended Use:

Open and closed fracture fixation, nonunion, precise control of bone segments location including angulation, rotation, translation, lengthening, and shortening. The External Fixator also aids correction of bone deformities or defects associated with fractures and other pathological conditions of bone. The limb function is preserved if the External Fixator is properly applied.

## Conclusion:

This device has equivalent intended use, has similar promotional claims, conforms to similar standards, and has equivalent technological characteristics to predicate devices.

## **Device Comparison Chart**

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Comparison Items	CyberOrthology Carbon	Ilizarov External Fixation
Comparison Rems	Fiber Composite Circular	System K962808
	Fixation (CIRfix) device	12 02000
Indication for Use	Part of external fixator aiding	Same
	trophism in the correction of	
	bone deformities/defects.	
Target population	Human of any gender and at	Same
	the advanced walking age	
Design	Same physical design, except	Circular half-ring with
	aesthetically and tactual more	overlapping ends to form a
	pleasing with improved	perfect ring when
	impression of superior	joined together by bolts and
	strength and safe mobility	nuts
Material	Radiolucent Carbon Fiber	Radiolucent Carbon Fiber
	Composite utilizing	Composite featuring
	Randomly orientated, pre-	pre-determined fiber
	impregnated carbon	orientations and typically 55%
	strands resulting in a	carbon fiber content.
	carbon fiber content of	
	better than 62%.	
Performance	Comparatively tested,	Compression Stiffness,
	indicating 15%-20%	(ASTM F-1746). 3-Point
	superiority.	Bending. Cantilever Bending.
		Wire Pull-out Test.
Sterility	Shipped none-sterile & device	Same
	may be sterilized as required	
D'	by any method.	Same
Biocompatibility	The component is a none invasive external device and	Same
	will not be used for	
	implantation or contact with	
	skin or soft tissues.	
Mechanical Safety	The test procedure	Same
Michanical Salety	&requirements allow for the	Same
	appropriate amount of rigidity	
	and stability.	
Chemical Safety	The device is indicated for use	Same
Chemical Salety	in clinical and common patient	
	living environment not being	
	exposed to	
	harmful chemical elements	
Compatibility with other	Compatible with all	Compatible with specially
Devices	appropriate predicate devices	designed frames, clamps, rods,
		couplings, pins, posts, bolts,
		washers, nuts, & others for the
		management of appropriate
		orthopedic surgeries.

## **Device Comparison Chart**

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Where used	The device is being used in	Same
	hospitals and in patients	
	surroundings and	
	environments	





SFP 2 2 2003

Food and Drug Administration 9200 Corporate Boulevard Rockville MD 20850

CyberOrthology, Inc. c/o Mr. Arthur Ward AJW Technology Consultants, Inc. 962 Allegro Lane Apollo Beach, FL 33572

Re: K032169

Trade/Device Name: CyberOrthology Carbon Fiber Composite Circular Fixation (CIRfix)

Device (Half Ring)

Regulation Number: 21 CFR 888.3030

Regulation Name: Single/multiple component metallic bone fixation appliances and

accessories

Regulatory Class: II Product Code: LXT Dated: June 30, 2003 Received: July 21, 2003

Dear Mr. Ward:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (301) 594-4659. Also, please note the regulation entitled. "Misbranding by reference to premarket notification" (21 CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <a href="http://www.fda.gov/cdrh/dsma/dsmamain.html">http://www.fda.gov/cdrh/dsma/dsmamain.html</a>

Sincerely yours,

Celia M. Witten, Ph.D., M.D.

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Director

Division of General, Restorative and Neurological Devices Office of Device Evaluation Center for Devices and Radiological Health

Enclosure

510(k) Number (if known): 1032/49 Device Name: CyberOrthology Carbon Fiber Composite Circular Fixation (CIRfix) Device (Half Ring) Indications For Use: Open and closed fracture fixation, nonunion, precise control of bone segments location including angulation, rotation, translation, lengthening, and shortening. The External Fixator also aids correction of bone deformities or defects associated with fractures and other pathological conditions of bone. The limb function is preserved if the External Fixator is properly applied. (PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NEEDED) Concurrence of CDRH, Office of Device Evaluation (ODE) Mark of Miller

Prescription Use (Per 21 CFR 801.109)

OR

Division of General, Restorative

510(k) Number \_\_\_\_\_ K03 2/69

and Neurological Devices

(Division Sign-Off)

Over-The-Counter Use

(Optional Format 1-2-96)